

EXHIBIT A

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
STATE OF MISSOURI

LENARD LUCKETT,)	
)	
Plaintiff,)	
)	Cause No.
vs.)	
)	Division
GUARDIAN LIFE INSURANCE)	
COMPANY OF AMERICA,)	
)	
Serve: CSC-Lawyers Incorporating)	
Service Company, Registered Agent)	
221 Bolivar Street)	
Jefferson City, MO 65101)	
)	
Defendant.)	

PETITION FOR DAMAGES

COMES NOW Plaintiff, LENARD LUCKETT, by and through counsel, Nathan S. Cohen, and for his Petition for Damages against Defendant, GUARDIAN LIFE INSURANCE COMPANY OF AMERICA, states to the court as follows:

1. That at all times relevant herein, Plaintiff is an was an individual over the age of 18 year residing and a resident of St. Louis County, State of Missouri.

2. At all time relevant herein, Defendant Guardian Life Insurance Company of America is and was an is a New York company registered to do business in the State of Missouri and operating as an insurance company, engaged in the business of life insurance and regularly soliciting business from, issuing policies to, and collecting premiums from Missouri residents.

3. At the time of his death, Curtis Saahir was insured under a policy of life insurance issued by Defendant under a plan held by Saahir's employer, Laminated and Fabricated, Plan No. 00558672, insuring his life, with Plaintiff named as beneficiary under said policy.

4. During his lifetime, Curtis Saahir, either individually or through his employer, paid all premiums due on the policy and met all conditions of continuing insurability pursuant to the policy.

5. Plaintiff Lenard Lockett was named sole beneficiary under the policy of insurance.

6. Defendant refused to pay on said policy of life insurance solely to Plaintiff, taking the position that Plaintiff is not the beneficiary of the policy.

7. Plaintiff notified Defendant that he disputed Defendant's assertion that he was not the named or intended sole beneficiary under the life insurance policy of Curtis Saahir.

8. Knowing that the rightful beneficiary of the life insurance policy of Curtis Saahir was in dispute, and in contravention of Curtis Saahir's intentions and in derogation of Plaintiff's rights, Defendant paid on said policy to the heirs of Curtis Saahir without any direction or court order.

9. It was the intention of Curtis Saahir that Lenard Lockett be designated as sole beneficiary of said policy upon his death.

10. As a result of Defendant's actions, Plaintiff has endured a great deal of emotional anxiety attendant to the death of Curtis Saahir, his brother, and has been deprived of his rights to the benefit of the proceeds of the life insurance policy covering the life of his brother.

11. As a result of Defendant's actions, Plaintiff has been damaged.

12. Plaintiff has incurred attorney's fees and costs associated with the behavior of Defendant and Defendant's failure to pay under the life insurance policy as intended.

WHEREFORE, Plaintiff prays for judgment against Defendant for damages in an amount in excess of \$25,000.00, and for an award of Plaintiff's attorney's fees and costs incurred herein, and for such other and further orders this court deems just and proper in the premises.

LAW OFFICE OF NATHAN S. COHEN


By: /s/ Nathan S. Cohen
Nathan S. Cohen, #36072
Attorney for Plaintiff
210 South Bemiston Avenue
St. Louis, MO 63105
(314) 727-6088 - Telephone
(314) 727-6081 - Facsimile
nathan@nathanscohen.com



IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: ELIZABETH BYRNE HOGAN	Case Number: 2422-CC11243	
Plaintiff/Petitioner: LENARD LUCKETT	Plaintiff's/Petitioner's Attorney/Address NATHAN S COHEN 210 SOUTH BEMISTON AVENUE ST LOUIS, MO 63105	
vs.		
Defendant/Respondent: GUARDIAN LIFE INSURANCE COMPANY OF AMERICA	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Other Tort		(Date File Stamp)

Summons in Civil Case

The State of Missouri to: GUARDIAN LIFE INSURANCE COMPANY OF AMERICA	
Alias:	
CSC LAWYERS INCORPORATING SERVICE COMPANY, RAGT 221 BOLIVAR STREET JEFFERSON CITY, MO 65101	COLE COUNTY, MO
 COURT SEAL OF CITY OF ST LOUIS	You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.
October 1, 2024	<i>Thomas Hoysinger</i>
Date	Circuit Clerk
Further Information:	

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.
- ☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.
- ☐ (for service on a corporation) delivering a copy of the summons and petition to: _____ (name) _____ (title).
- ☐ other: _____

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$._____ per mile)
Total	\$ _____

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
STATE OF MISSOURI

LENARD LUCKETT,)	
)	
Plaintiff,)	
)	Cause No. 2422-CC11243
vs.)	
)	Division 1
GUARDIAN LIFE INSURANCE)	
COMPANY OF AMERICA,)	
)	
Defendant.)	

MEMORANDUM TO CLERK PERTAINING TO SERVICE

COMES NOW Plaintiff, LENARD LUCKETT, by and through counsel, and files his server's return of Summons and Petition in this cause upon Defendant, GUARDIAN LIFE INSURANCE COMPANY OF AMERICA, along with the cost bill for service, and requests said cost to be taxed herein.

LAW OFFICE OF NATHAN S. COHEN

By: /s/ Nathan S. Cohen
Nathan S. Cohen, #36072
Attorney for Plaintiff
210 South Bemiston Avenue
St. Louis, MO 63105
(314) 727-6088 - Telephone
(314) 727-6081 - Facsimile
nathan@nathanscohen.com

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing was electronically filed on October 3, 2024 with the Clerk of the Circuit Court by using the Missouri e-Filing System, and that participants in the case who are registered users will be served by the system pursuant to Rule 103.08.

/s/ Nathan S. Cohen



IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: ELIZABETH BYRNE HOGAN	Case Number: 2422-CC11243	
Plaintiff/Petitioner: LENARD LUCKETT	Plaintiff's/Petitioner's Attorney/Address NATHAN S COHEN 210 SOUTH BEMISTON AVENUE ST LOUIS, MO 63105	
vs.		
Defendant/Respondent: GUARDIAN LIFE INSURANCE COMPANY OF AMERICA	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Other Tort		(Date File Stamp)

Summons in Civil Case

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Alias:	COLE COUNTY, MO
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COURT SEAL OF CITY OF ST LOUIS	You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.
October 1, 2024	<i>Thomas Hoyer</i>
Date	Circuit Clerk
Further Information:	

Sheriff's or Server's Return	
Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.	
I certify that I have served the above Summons by: (check one)	
<input type="checkbox"/> delivering a copy of the summons and petition to the defendant/respondent.	
<input type="checkbox"/> leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.	
<input checked="" type="checkbox"/> (for service on a corporation) delivering a copy of the summons and petition to: <u>LAUREN SHIPLEY-CSC LAWYERS</u> (name) <u>CSC LAWYERS-PROCESSOR</u> (title).	
<input type="checkbox"/> other: _____	
Served at <u>CSC LAWYERS, 221 BOLIVAR ST., Jefferson City</u> (address)	
in <u>Cole</u> (County/City of St. Louis), MO, on <u>OCT 3, 2024</u> (date) at <u>9:30 AM</u> (time).	
	<u>Curtis Mark Johnson</u> (Signature of Sheriff or Server)
Must be sworn before a notary public if not served by an authorized officer:	
Subscribed and sworn to before me on <u>10/03/24</u> (date).	
My commission expires: <u>03/25/25</u> (Date)	<u>Curtis Mark</u> (Signature of Notary Public)
Notary Public	
Sheriff's Fees, if applicable Summons \$ _____ Non Est \$ _____ Sheriff's Deputy Salary \$ _____ Supplemental Surcharge \$ 10.00 Mileage \$ _____ (_____ miles @ \$ _____ per mile) Total \$ _____	
A copy of the summons and petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.	

STL Investigations

10 Amber Meadows Dr
O Fallon, MO 63366-3984
STLInvestigate@gmail.com

INVOICE

BILL TO

Nathan S. Cohen
210 South Bemiston Avenue
Missouri
St. Louis, MO 63105

INVOICE # 4083**DATE** 10/03/2024**DUE DATE** 11/02/2024**TERMS** Net 30**STL CASE #**

24-3835

CLIENT JOB # / NAME

Luckett, Lenard

REQUESTED BY

Christine

DATE	DESCRIPTION	QTY	RATE	AMOUNT
	Guardian Live Insurance Company of America - Jefferson City	1	90.00	90.00

MO PI #2010007682

MO PI Agency #2017029207

IL PI #115.002561

IL PI Agency #117.001791

KS PI #D-5568

STL City SPS #627

BALANCE DUE**\$90.00**